

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X

**In re Application of GORSOAN LIMITED
and GAZPROMBANK OJSC for an Order
Pursuant to 28 U.S.C. § 1782 to Conduct
Discovery for Use in a Foreign Proceeding.**

Case No.: 17-cv-05912
ECF Case

-----X

[PROPOSED] ORDER

This matter comes before the Court following the suspended deposition of Janna Bullock (“Bullock”) on February 6, 2018, and the request by petitioners Gorsoan Limited and Gazprombank JSC (“Gorsoan”) for a finding of contempt as a result of Bullock’s conduct at her deposition and failure to comply with her discovery obligations. The Court having reviewed the transcript of the deposition and the written submissions of the parties, having heard arguments from the parties on April 17, 2018, and the parties having had additional opportunity to provide written submissions.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. Bullock is in contempt of Court for her perjurious testimony at her deposition;
2. Bullock’s deposition will be completed in Court, under the Court’s supervision, at a date to be set by the Court;
3. Bullock shall provide to Gorsoan all of her documents and electronically stored information in conformity with the review protocol attached as Exhibit 1 to this Order, and all legal fees and costs associated with such review will be reimbursed to Gorsoan by Bullock;
4. Bullock is in contempt of Court for her spoliation of evidence and that it be taken as established that Ms. Bullock currently holds or previously held assets responsive to paragraph 2 of the March 6, 2013 order issued by the District Court of Limassol (Cyprus) in Action No. 3573/2012 (“Freezing and Disclosure Order”) and that she failed to disclose them and to provide the relevant documents called for by paragraph 2 of the Freezing and Disclosure Order;

5. Bullock shall produce to Gorsoan all documents concerning the Landmark Trust including without limitation all documents concerning the transfer by the said trust of the property located at 210 Meadow Lane, Southampton, New York, and the disposition of the proceeds arising from such transfer; and,

6. Gorsoan is awarded its attorneys' fees and costs in the amount of \$ 37,916.80, as set forth in Exhibit C to the parties' joint letter to the Court dated May 21, 2018. .

Dated: _____

The Honorable Richard J. Sullivan
United States District Court for the
Southern District of New York

EXHIBIT 1

[Proposed] Review Protocol

TransPerfect will collect the following electronic material, from the period August 8, 2012 to present:

- Electronic mail accounts:
 - o janna@jannabullock.com
 - o jannabullock@aol.com
 - o js200007@yahoo.com
 - o js200005@yahoo.com
 - o jannabullock@rigroup.com
- Electronic documents maintained on Ms. Bullock's current laptop
- Text messages maintained on Ms. Bullock's cellphone

TransPerfect will at the same time complete a forensic inspection of Ms. Bullock's current laptop.

- I. Phase I:** Segregation of potentially privileged attorney-client communications for review and where applicable, privilege logging or production, and segregation of medically sensitive and/or otherwise personally sensitive information, for review by Sher Tremonte

A. Potentially privileged attorney-client communications

Sher Tremonte will apply the search terms in Part III to potentially privileged attorney-client communications. The list of firms and individuals who may come within the attorney-client privilege is attached hereto. Where a communication is responsive and privileged, then counsel will log such communication on a privilege log sufficient to comply with the requirements of Fed. R. Civ. Proc. 26(b)(5). Where a communication is responsive and is not privileged, then counsel will produce that communication. To the extent possible, privileged information will be redacted as opposed to withheld, with a privilege redaction log provided.

B. Medically sensitive and/or otherwise personally sensitive information

Sher Tremonte will derive and apply search terms to segregate Ms. Bullock's medically sensitive information, to include, for example, the names of Ms. Bullock's healthcare providers, health networks, pharmacies, medications, and other similar information. Sher Tremonte will confer with Foley Hoag to describe categories of documents searched for withholding, but will not provide the search terms themselves.

II. Phase II: Sampled review by Foley Hoag to identify assets

Withholding the documents identified in Phase I, above, TransPerfect will create a database containing all other documents for Foley Hoag's review.

Foley Hoag will sample documents to identify potential assets. Without limitation, this will include sampling to identify homes (e.g., applying search terms such "Brown Harris Stevens,"

“realtor,” “Sotheby’s,” or “purchase and sale”), artwork (e.g., “Christie’s,” “Picasso,” “Kandinsky,” or “Chagall”), cars and boats (e.g., “Tzarina”), accounts (e.g., banks, providers of credit, investment vehicles), and other assets (e.g., jewelry, furniture, clothing, watches).

III. Phase III: Key work search for identified assets as well as individuals and entities named in the subpoena, for review and where applicable production by Foley Hoag

This phase of review involves the application of search terms to the collection of electronic documents provided by TransPerfect to Foley Hoag. Search terms will include those terms derived in the Phase II review, above, and the terms listed below. Documents will be produced by family (email and attachment(s)), meaning that if any document in a family is responsive, then the entire family is produced.

- “Golden Venture Trust”
- “Golden Trust”
- “Purple Trust”
- “Azul Trust”
- “Azur Trust”
- Golden or Purple or Azul or Azur /s trust!
- RIGroup
- “R I Group”
- Laziar
- “Nova Prova”
- Nogion
- Alcork
- Kitnell
- Elmwood
- Solferino
- “SAS Societe”
- Pralong
- Crystal
- “Puy Robert”
- “Hotels d’Altitude”
- Polintic
- Trabol
- Monli
- “Imperial Field”
- Ammopia
- Skeveor
- “Terminus Trading”

- Menetes
- Hosbern
- Adminico
- Maicon
- Vixenbridge
- Jarment
- Jarmen
- Rution
- Southwark
- Danfold
- Jaze
- “54 East 64”
- “9 East 67”
- Malfort
- Hotrast
- Barnsdale
- Leiko
- Napton
- Lahugral
- Lysanflor
- Celederia
- Gaildor
- Linden
- Westbury
- Flodemer
- Vartberg
- “Trot Trading”
- “Perla Development”
- Topola
- “Royal Winner”
- “Morris Invest”
- WestLogistics”
- Retrex
- IKMO
- MOIA
- MOTIK
- Alexey
- Kuznetsov

- Liudmila
- Bezdel
- Dmitry
- Kotlyarenko
- Valery
- Nosov
- Stuart
- Zoe
- Zoya
- Kuznetsova
- Palema
- Cyproman
- Papas
- Charambos
- Pampos
- Soulian
- Eleni
- Kinani
- Atzini
- Gianna
- Antoniou
- Afroditi
- Dimitriou
- Michail
- Christou
- Panikos
- Symeou
- “Cyprus Popular”
- “Hellenic Bank”

In re Application of Gorsoan Ltd. & Gazprombank OJSC, Case No. 17-cv-5912

List of Attorneys and Law Firms for Privilege Review

1. **Hogan & Hartson LLP**: Maude Bagramoff, Eltvedt Edouard, James Vaudoyer
2. **Nobel & Hug Rechtsanwälte**: Bernet Benno, Markus Kaempf, Sandra Spirig
3. **Bruguiera & Emir**: Arnaud Bruguiera
4. **Etude Dandois & Meynial**: Michael Dandois, Antoine Meynial, Angela Lippolis
5. **Jakubowicz Mallet Guy & Associates**: Marie Caillat-Depocas
6. **Salans LLP**: Francois Chateau, Sandra Hazan, Richard Marty, Pascale Poupelin, Michelle Vasiljikovic, Damien d'Angicourt, Nathalie Jacquemart, Elodie Luksys, Stephanie Ragni, Nicole Virmouw
7. **Savin Martinet Associates**: Arnaud Constant
8. **Loeb & Loeb LLP**: Tal Dickstein, John Piskora, Eugene Licker, Martin Pollner, Geri Papa, Vicki Williams, Yolanda Bacote, Olga Grafakos
9. **Lamy & Associates**: Sasha Dimitrevic, Pierre Ferry, Matthias Vuillermet, Philippe Genin
10. **CMS Bureau Francis Lefebvre**: Pierre-Jean Douvier, Ivana Zivanovic, Elena Costa, Pierre Ducret, Charles Poncet, and Tobias Zellweger
11. **Gersten Savage LLP**: Peter Gennuso, Steven Popofsky, Robert Wolf
12. Narcisse Ghazi
13. Gregoire Rincourt
14. **Temime**: Marion Gregoire, Julia Minkowski
15. **Symeou, Konnaris & Co. LLC**: Panikos Symeou, Katerina Adamou
16. **Moses & Singer LLP**: Jason Canales
17. **George Charalambides & Co.**: Charis Charalambides, George Charalambides
18. **Lefkos Clerides & Sons**: Nicos Clerides, John Clerides
19. **Ginestie Magellan Paley-Vincent**: Madeleine Fabre, Clara Mazaud, Yehudi Pelosi
20. **Michael Kyprianou & Co. LLC**: Anna Grigorieva, Anna Pavlova
21. Kristian Groke
22. Marie Roumiantseva
23. Jeremy Satkiewicz
24. Stuart A. Smith
25. **Troy & Associates**: Georges Troy
26. **Andreas Neocleous & Co. LLC**: Chrysanthos Christoforou, Christos Melides
27. **Peters & Peters Solicitors LLP**: Maria Cronin, Michael O'Kane
28. **Lellos P. Demetriades Law Office LLC**: Achilleas Demetriades, Natasha Iakovou
29. **Amsterdam & Partners LLP**: Andrew Durkovic, Robert Amsterdam
30. Michael Gladun
31. Roys Poyiadjis
32. Charilaos Velaris
33. **Kobre & Kim LLP**: Michael Kim
34. **Knoops Advocaten**: Alex Knoops, Lizette Vosman
35. Jerome LeWine
36. **Crowell Moring**: Stuart Newberger
37. **Lebray & Associates**: Stephanie Bonifassi, Michael Haeuptli

In re Application of Gorsoan Ltd. & Gazprombank OJSC, Case No. 17-cv-5912

- 38. **Hughes Hubbard & Reed LLP**: Edward Little
- 39. **Spinosi Sureau**: Lou Salome Sorlin, Patrice Spinosi, Elsa Zimmer
- 40. **Van Traa Advocaten N.V.**: Olivier Bohmer
- 41. **DLA Piper Nederland N.V.**: Gerard Endedijk
- 42. **Blank Rome LLP**: John Kimball, William Tansey
- 43. Richard Schulman
- 44. **BMD Associes**: Christopher Boinet
- 45. **Cabinet Defrenois et Levis**: Marc Levis
- 46. Joshua Abraham
- 47. **Sontag & Hyman P.C.**: Michael Hyman
- 48. **Chemtob Moss & Forman**: Nancy Chemtob
- 49. Byron Hero
- 50. **Platzer, Swergold, Levine, Goldberg, Katz & Jaslow, LLP**: Richard A. Lafont
- 51. **Moritt Hock & Hamroff LLP**: Greg Calabro, Alex Widell
- 52. **Sher Tremonte LLP**: Michael Tremonte, Mark Cuccaro, Emily Burgess